

Isaac N. Sutphin
Holland & Hart LLP
2515 Warren Ave., Suite 450
Cheyenne, WY 82001
Phone (307) 778-4200
Fax (307) 778-8175
E-mail: insutphin@hollandhart.com

Counsel for ExxonMobil Oil Corporation

Francis J. Lawall (admitted *Pro Hac Vice*)
Pepper Hamilton LLP
18th and Arch Streets
Philadelphia, PA 19103
Phone: 215/981-4000
Fax: 215/981-4750
lawallf@pepperlaw.com

Deborah Kovsky-Apap (admitted *Pro Hac Vice*)
Pepper Hamilton LLP
100 Renaissance Center, Suite 3600
Detroit, MI 48243-1157
Phone (313)259-7331
Fax: (313)259-7926
kovskyd@pepperlaw.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)	Chapter 11
)	
RED EAGLE OIL, INC.,)	Case No. 11-20857
)	
Debtor.)	
)	

**LIMITED OBJECTION OF EXXONMOBIL OIL CORPORATION TO
DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY OR GRANT
PRELIMINARY INJUNCTION**

Creditor ExxonMobil Oil Corporation (“*ExxonMobil*”), through its undersigned attorneys, hereby presents this limited objection to the Debtor’s motion (the “*Motion*”) to extend the automatic stay or for grant of a preliminary injunction. In support of its objection, ExxonMobil states as follows:

1. Non-debtors Dale Hinze, Judith Hinze, Bryan Hinze, Brad Hinze and Scott Hinze (the “*Shareholders*”) executed and delivered their personal guaranties to ExxonMobil, guaranteeing the payment of all existing and future indebtedness of the Debtor to ExxonMobil.

2. For the reasons set forth in the objections of CHS Inc. [Docket No. 87] and DATS Trucking, Inc. [Docket No. 94], which ExxonMobil incorporates herein by reference, the facts and circumstances of this case do not warrant a blanket and open-ended extension of the automatic stay to the Shareholders.

3. However, ExxonMobil does not object to an order temporarily staying litigation and collection efforts against the Shareholders for 120 days. A temporary, time-limited stay would give the Shareholders an opportunity to maximize the Debtor’s value without the distraction of litigation (which largely arises out of the business enterprise), while not unduly prejudicing ExxonMobil. At the end of the 120-day period, the Court will be able to evaluate the progress the Debtor has made and determine whether a further extension of the stay is appropriate.

WHEREFORE, ExxonMobil respectfully requests that the Court limit the relief sought by the Debtor’s Motion to a temporary stay of 120 days.

DATED: August 31, 2011

Respectfully submitted,

HOLLAND & HART LLP

/s/ Isaac N. Sutphin

Isaac N. Sutphin
2515 Warren Ave., Suite 450
Cheyenne, WY 82001
Phone (307) 778-4200
Fax (307) 778-8175
insutphin@hollandhart.com

Counsel for ExxonMobil Oil Corporation

Deborah Kovsky-Apap (admitted *Pro Hac Vice*)
PEPPER HAMILTON LLP
Suite 1800
4000 Southfield Town Center
Southfield, MI 48075
Phone: (248) 359-7331
Fax: (313) 731-1572
kovskyd@pepperlaw.com

Counsel for ExxonMobil Oil Corporation

-and-

Francis J. Lawall (admitted *Pro Hac Vice*)
PEPPER HAMILTON LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
Phone: (215) 981-4000
Fax: (215) 981-4750
lawallf@pepperlaw.com

Counsel for ExxonMobil Oil Corporation

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served August 31, 2011 upon the U.S. Trustee, Debtor's counsel, and all other parties registered as CM/ECF users in this case via the Court's CM/ECF electronic mail service.

/s/ Isaac N. Sutphin

5222867_1.DOC